

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

WILLIAM GIBBONS,

Plaintiff,

-against-

LEONARD FRONTON, D.O., STEVEN FEIN,
M.D., STERLING MEDICAL CORPORATION,
DEPARTMENT OF VETERANS AFFAIRS and
THE UNITED STATES OF AMERICA,

Defendants.

ECF Case

Case No.: 07-CV-2801 (MGC)

DECLARATION OF SHERRI L.
PLOTKIN

SHERRI L. PLOTKIN, pursuant to 28 U.S.C. §1746, declares the following under penalty of perjury:

1. I am a partner of the law firm Barton, Barton & Plotkin, LLP located at 420 Lexington Avenue, New York, N.Y. 10170, attorneys for the Plaintiff WILLIAM GIBBONS in the above-captioned action.

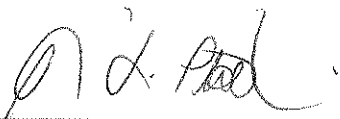
2. I submit this declaration in support of Plaintiff's Memorandum of Law in Opposition to Defendants' Memorandum of Law seeking to dismiss the complaint pursuant to Fed. R. Civ. P. 12(b)(1) and 12(b)(6).

3. Attached hereto as Exhibit "A" is a true and correct copy of Plaintiff's medical records from the Miami VA currently in plaintiff's possession.

4. Attached hereto as Exhibit "B" is a true and correct copy of the information obtained from the internet regarding Defendants Dr. Fronton and Dr. Fine's credentials, specialties, certifications, staff privileges, education and training, academic appointments, criminal offenses and/or disciplinary actions, if any, taken against said physicians.

I declare under the penalty of perjury that the foregoing is true and correct.

Dated: New York, New York
September 18, 2007



SHERRI L. PLOTKIN (SLP 3216)